

Environmental Protection Agency
Alaska Operations Office

RCRA Compliance Evaluation Inspection Report

AK0701 File 4a
8/23/91
COPY

Facility Name: Mapco Alaska Petroleum Inc.

Facility Location: North Pole, Alaska

Facility EPA ID#: AKD000643239
0701

Company Representative: Kathleen McCullom, Environmental
Coordinator
Mapco Alaska Petroleum, Inc.
P1100 H&H Lane
North Pole, Alaska 99705

(907) 488-2741

Date of Inspection: July 29, 1991

Date of Report: August 23, 1991

EPA Lead Inspector: Kurt A. Eilo
Hazardous Waste Coordinator
U.S. EPA - Alaska Operations Office
222 West 7th Avenue, Box 19
Anchorage, Alaska 99713-7588

(907) 271-5083

EPA Inspector: Al Odmark
Jeffrey Rodin (HW-112)
1200 Sixth Avenue
Seattle, WA 98101

(206) 553-2859

State Inspectors: Greg Zimmerman
Chris Debois
Alaska Department of Environmental
Conservation
Northern Regional Office
1001 Noble Street, Suite 350
Fairbanks, Alaska 99701

(907) 452-2360

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[Signature]
8/23/91

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I. Introduction:

On July 29, 1991, EPA and the Alaska Department of Environmental Conservation (ADEC) conducted a RCRA compliance evaluation inspection of Mapco Alaska Petroleum Inc. hazardous waste activities. The facility was notified of the inspection the morning of the inspection to assure that appropriate personnel would be available. The inspection began by explaining the purpose and objectives of the inspection to Kathleen McCullom, and Gerald Fritz. EPA credentials were presented to Kathleen McCullom and Gerald Fritz.

This inspection report will describe the observations made during the inspection and will identify the inspectors concerns and the potential violations of applicable EPA regulations under Resource Conservation and Recovery Act (RCRA), and applicable State of Alaska Hazardous Waste Regulations. This report will not evaluate the ongoing corrective actions under the 3008(a) Complaint and Compliance Order and a 3008(h) Administrative Order on Consent issued subsequent to the 1987 RCRA CEI.

II. Applicable RCRA Subtitle C Regulations:

40 CFR 262 -Standards Applicable to Generators of Hazardous Waste (18 AAC 62.210)

40 CFR 265 -Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities (18 AAC 62.410)

40 CFR 268 -Land Disposal Restrictions

40 CFR 270 -EPA Administered Permit Programs: The Hazardous Waste Permit Program

III. Background/Record Review:

Mapco Alaska Petroleum Inc. (Mapco) operates as a small quantity generator of hazardous waste as a result of petroleum refining activities. As a result of the 1987 RCRA CEI, EPA issued a 3008(a) Complaint and Compliance Order and a 3008(h) Administrative Order on Consent. Mapco is currently operating a groundwater petroleum product recovery system as part of this consent order.

On March 12, 1987, Mapco notified EPA of their hazardous waste activities as a generator of hazardous waste.

RCRA Compliance Evaluation Inspections (CEI) have been conducted at the Western Operating Area facility annually since 1987.

According to Kathleen McCullom, Mapco has provided personnel training for employees that handle hazardous waste in addition to OSHA training requirements. For operators involved in handling K050 and other hazardous wastes, this training includes a annual 1 hour course on hazardous waste and housekeeping and on-the-job refresher training. Operators that handle tetraethyl lead (lead additive for lead gasoline) also receive specialized training from Ethyl Corporation.

Kathleen McCullom outlined the types of wastes typically generated at Mapco:

K050 - heat exchanger bundle sludge - 1 to 2 55 gal. drums/year

F037 - oily wastewater separator sludge - 2 drums/year
(previously manifested as D001)

D008 - tetraethyl lead - absorbent pads

D018 - wastewater and stormwater from tank 192 (run through air
stripper and discharged to lagoon system)

waste oil - vehicle maintenance (sent to Seeking Ford for energy recovery)

kerosene baths - maintenance facility - (recycled in plant after halogens
testing)

electraclean - halogenated solvent

laboratory - D009 - mercury thermometers/contaminated debris

nonhazardous waste absorbent pads - (sent to Northslope borough
incinerator)

propylene glycol

sulfolane (previously consider hazardous waste under EP Tox)

Manifests were reviewed from the date of previous CEI to the date of this inspection and no potential violations were observed by the inspectors as a result of this CEI (see Attachment 1). Facility manifests also identify that the facility generates waste paint and paint thinners with chromium (D007).

Attachment 2 includes a map of the Mapco facility. Attachment 3 is the Mapco response to the outbriefing of this inspection.

IV. Field Inspection:

Plant heat exchangers -

The inspection team viewed various heat exchangers throughout the facility. The routing cleaning of these heat exchangers generates K050 hazardous waste (see photos 1-2).

Sump 05-7 -

This sump was undergoing closure as part of the consent order (see photo #3).

Sump 901 -

This sump is undergoing closure/corrective action and was the previous site of disposal of navy solvent (see photo #4).

Tank 192 -

This tank is used to store oily water prior to segregation and treatment (see photo #5).

Effluent Building

The effluent building is now used to add products into the crude oil. According to Kathleen McCullom, this area is a satellite storage area (see photo #6). There was 1 55 gal. drum of F037 sump sludge which was collected from various areas throughout the plant. Kathleen McCullom explained that the drum may be moved to each of the sump sludge areas for collection of the waste. The drum is inspected daily by operators. An accumulation start date was marked as 5/10/91 and a hazardous waste label was placed on the side of the drum.

This drum does not appear to be under the control of the operator of the process generating the waste and is not at or near the point of generation and therefore does not appear to meet the definition of a satellite storage area. 40 C.F.R. § 262.34(c)(1) specifies that a generator may accumulate as much as 55 gallons of hazardous waste in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste. According to Kathleen McCullom, Mapco conducts daily inspections of this hazardous waste and appears to have marked the drum in accordance with 40 C.F.R. § 262.34(a). The container was not in storage for greater than 90 days based upon the accumulation start date as marked. I explained to Kathleen McCullom that this area probably would not

constitute a satellite storage area and although it appeared as if there was no violation, Mapco might be in violation if the drum was stored in excess of 90 days.

There was 1 drum of sulfolane in storage at the effluent building which is considered to be nonhazardous since the TC rule became effective according to Mapco.

Hazardous Waste Storage Area -

The hazardous waste storage area consists of a concrete diked pad and a fence. A 55 gal drum of K050 heat exchanger bundle sludge, and a 15 gal drum containing electraclean, a F001, F002 waste, was in storage at the time of the inspection. The K050 drum had a hazardous waste label and the accumulation start date was marked as 5/2/91. The F001, F002 drum also had a hazardous waste label and was marked as 4/11/91 (see photo #7). Kathleen McCullom explained that inspections are conducted at least weekly for this storage area.

Lagoon B -

Lagoon B was taken out of service as a result of ongoing corrective actions. A new liner was being installed at the time of the inspection (see photos 8-9). Lagoon B will be used as holding basin to avoid shocking the treatment facility during high flow periods.

Lagoon C -

Lagoon C is shown in photo #10. The lagoon is lined similar to lagoon A and B.

Fire Training Area -

The fire training area is shown in photo 11. The area has been lined since about 1988.

Lagoon A -

Lagoon A received a new liner in 1991 (see photo 12). Lagoon A will hold approximately 1 million gallons.

Laboratory -

The laboratory generates mercury waste (D009) including spill debris from mercury thermometers. Outside the laboratory door was a 35 gal container labeled as

Mercury Spill Debris (see photos 13-14). There was no accumulation start date on the container. According to Kathleen McCullom, Mapco operates this site as a satellite accumulation area and that a date on the container would not be required until the container is full or 55 gallons of waste has been accumulated. 40 C.F.R. § 262.34(c)(1) specifies that a generator may accumulate as much as 55 gallons of hazardous waste in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste. The container does not appear to be at or near the point of generation and under control of the operator.

Infiltration Gallery -

The airstrippers used a part of the corrective action process are shown in photo #15.

V. Outbriefing:

At the completion of the field portion of the inspection Kathleen McCullom, and Gerald Fritz were briefed on the following concerns identified by the inspectors:

1. The storage area at the Effluent building should be managed as a less than 90 day storage area.
2. The laboratory satellite accumulation area was not at or near the point of generation or under the control of the operator.

VI. Findings:

1. 40 C.F.R. § 262.34(c)(1) specifies that a generator may accumulate as much as 55 gallons of hazardous waste in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste. The container at the laboratory does not appear to be at or near the point of generation and under control of the operator.

ATTACHMENTS

Attachment 1 - Mapco Hazardous Waste Manifests

Attachment 2 - Facility Map

Attachment 3 - Mapco 1991 CEI Response to Outbriefing

PHOTOGRAPHS

PHOTOGRAPHS

- Photo #1 - heat exchangers
- Photo #2 - heat exchangers
- Photo #3 - sump 05-7
- Photo #4 - sump 901
- Photo #5 - tank 192
- Photo #6 - effluent building
- Photo #7 - hazardous waste storage area
- Photo #8 - lagoon B
- Photo #9 - lagoon B
- Photo #10- lagoon C
- Photo #11- fire training area
- Photo #12- lagoon A
- Photo #13- laboratory
- Photo #14- laboratory
- Photo #15- infiltration gallery - air strippers

C-LINE #52572
5"x7" PRINTS

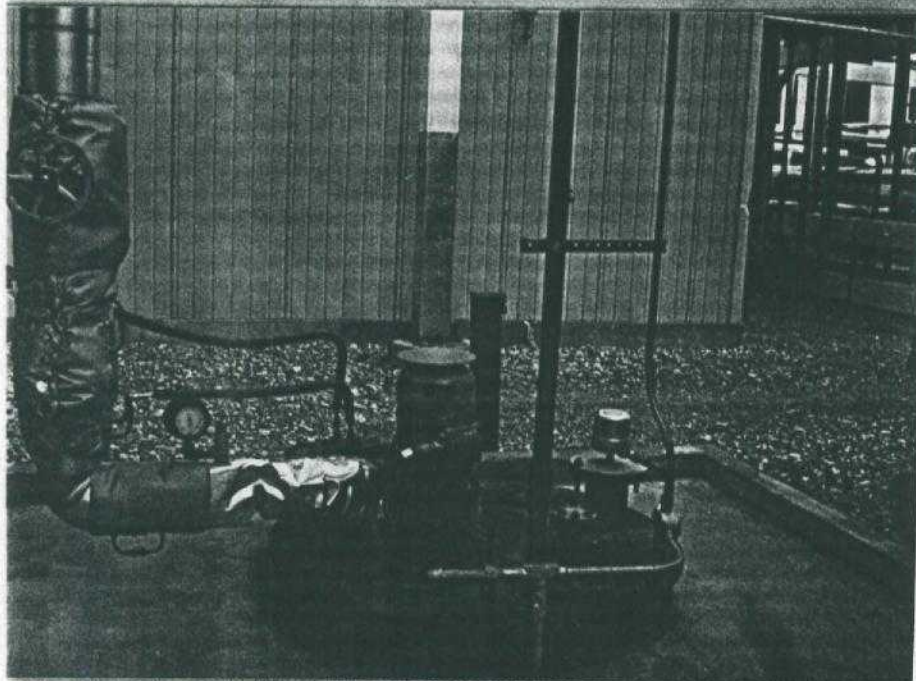


PHOTO
3

PHOTO
1

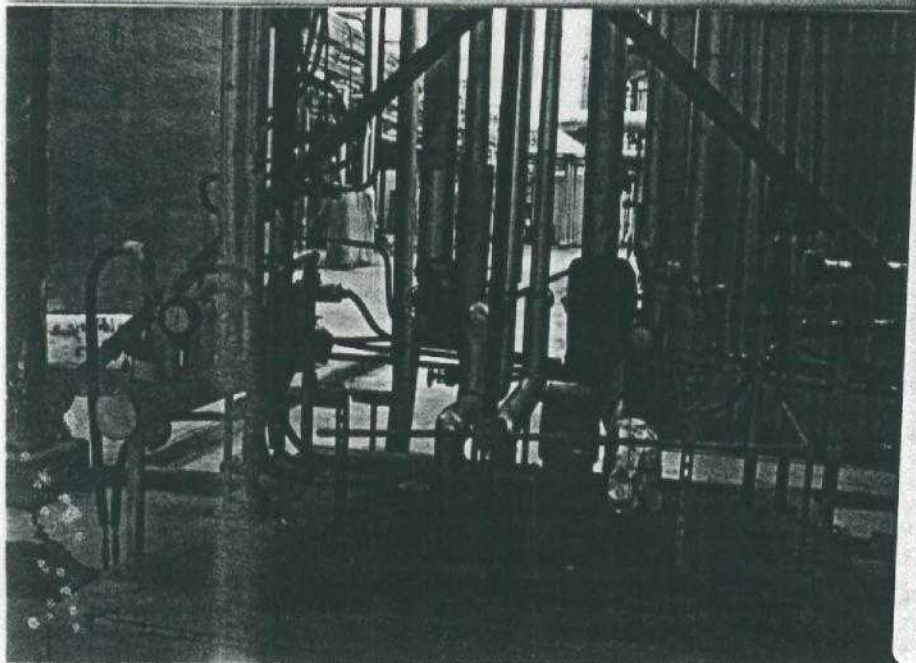
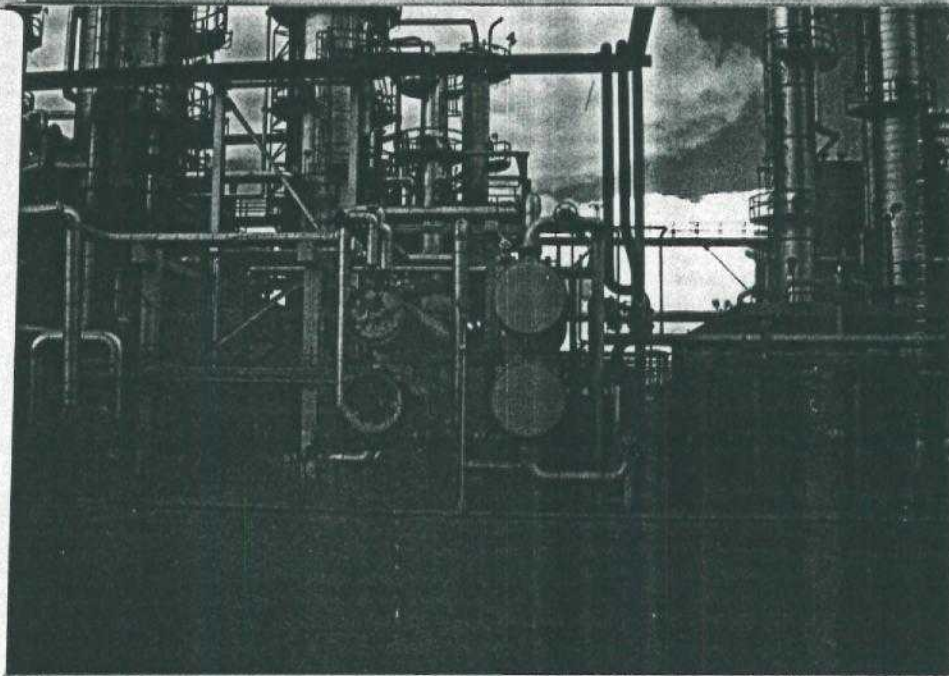
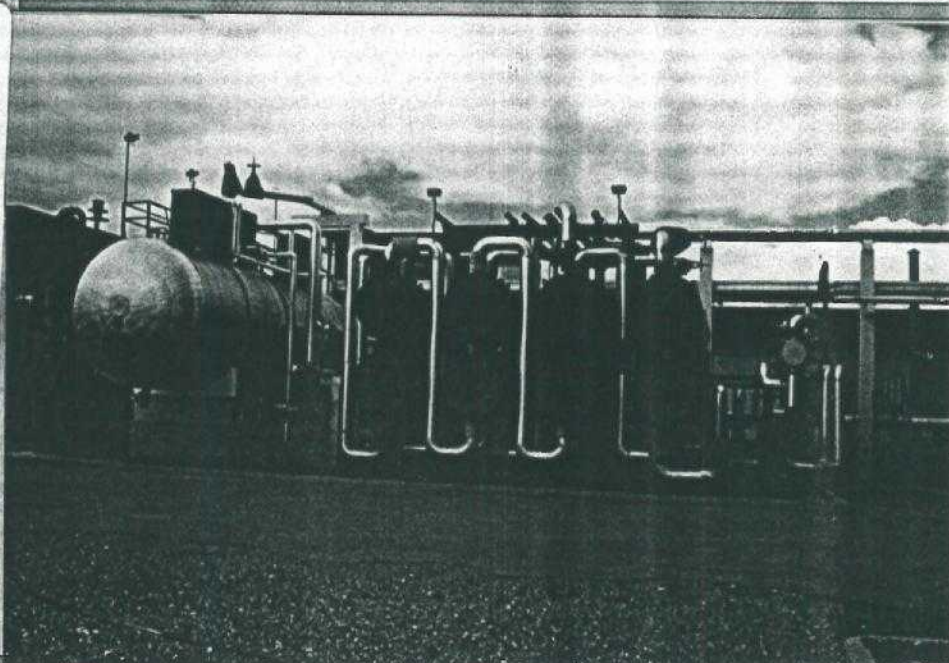


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4

PHOTO
2





PHOTO

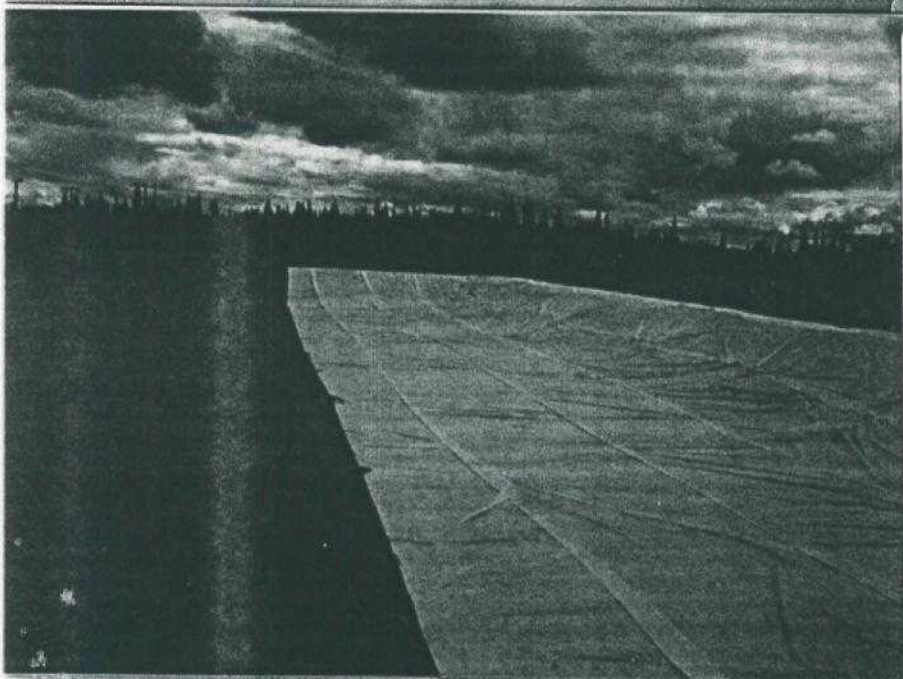
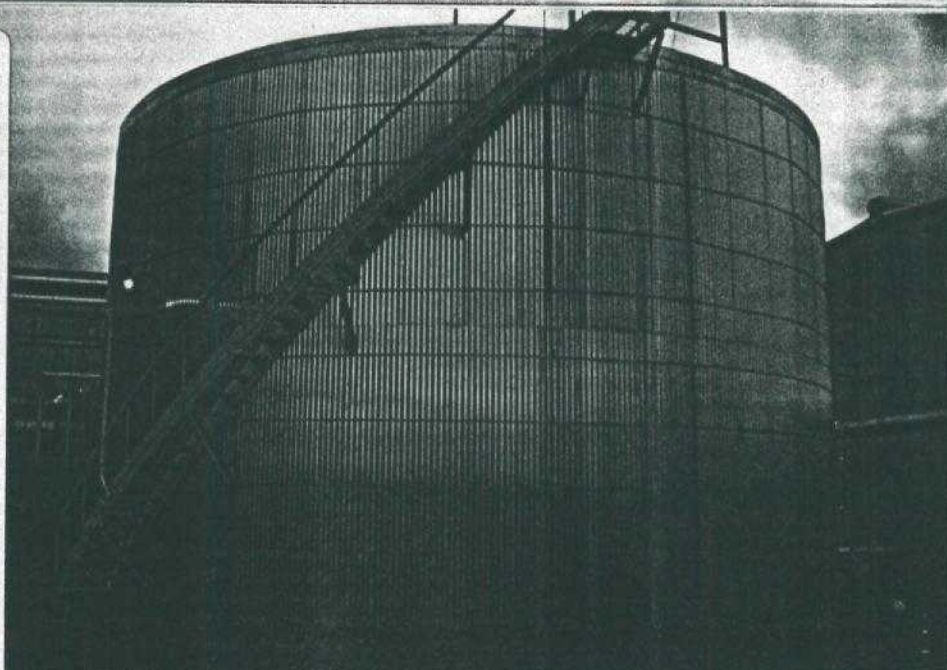
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6



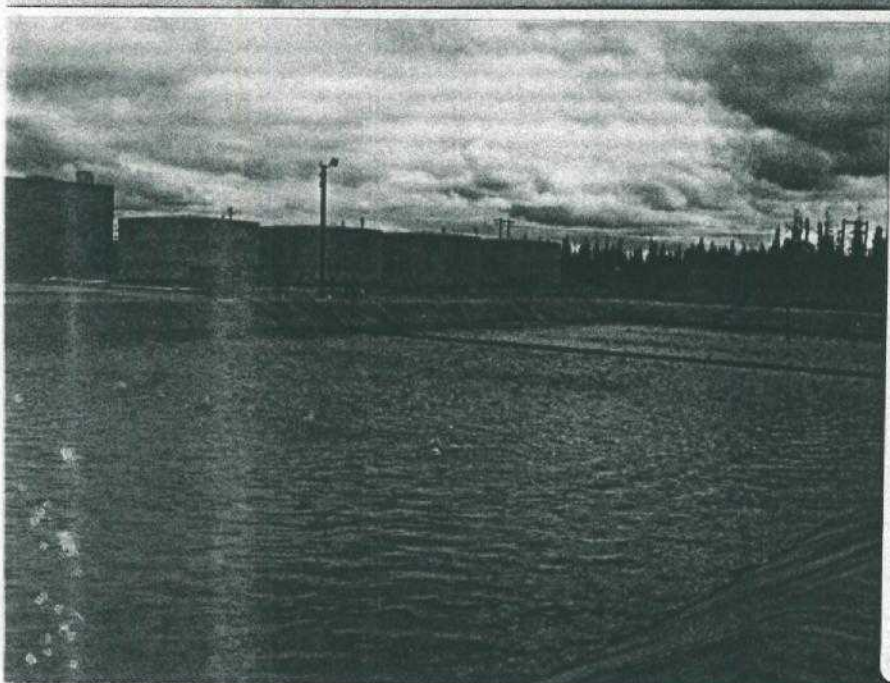


PHOTO

11

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9



PHOTO

12

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10



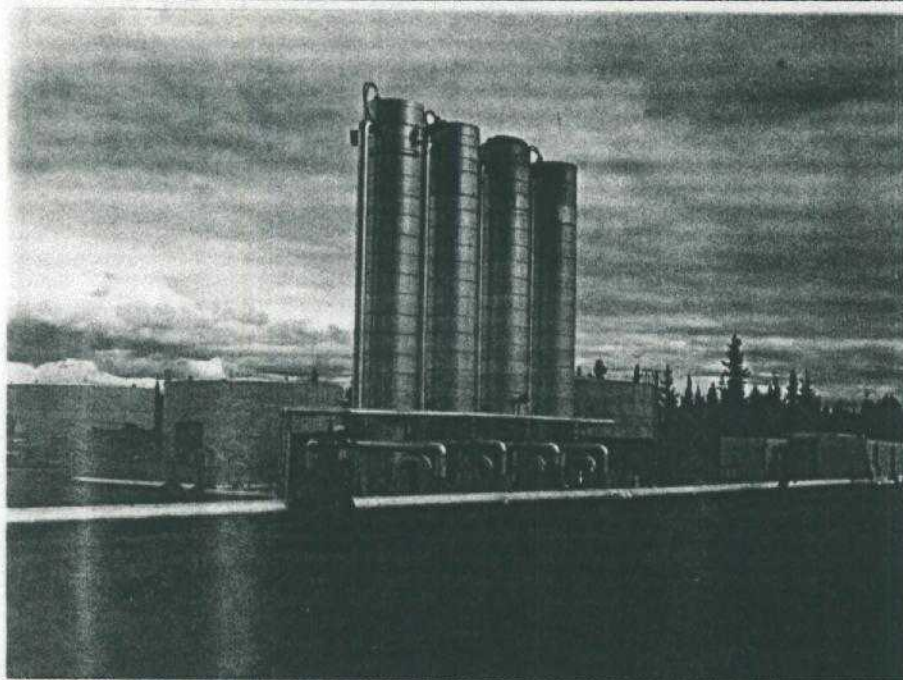


PHOTO # 15

PHOTO # 13

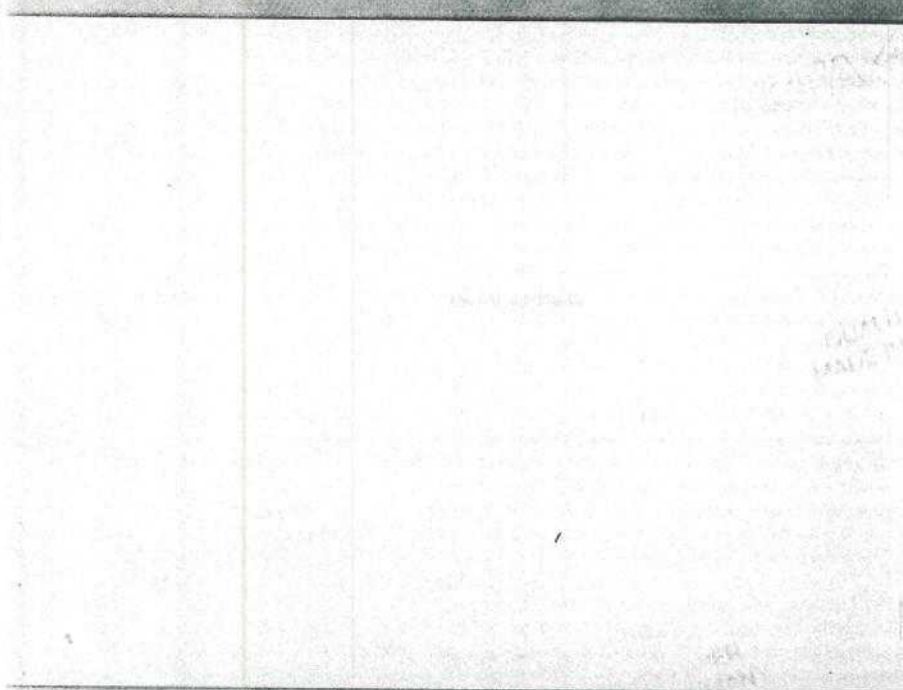
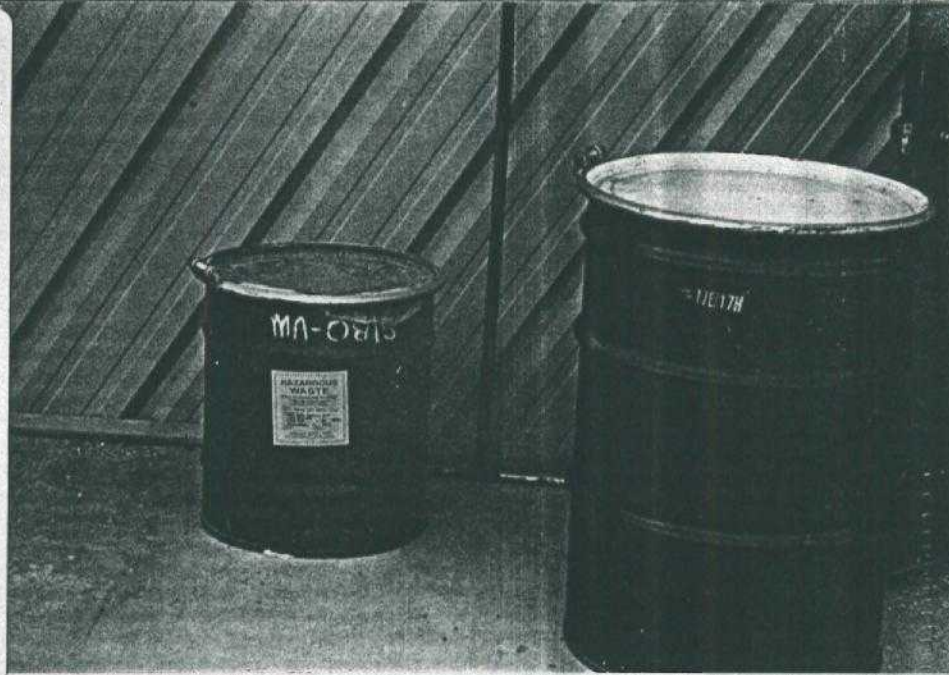


PHOTO # 14



ATTACHMENT #1

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

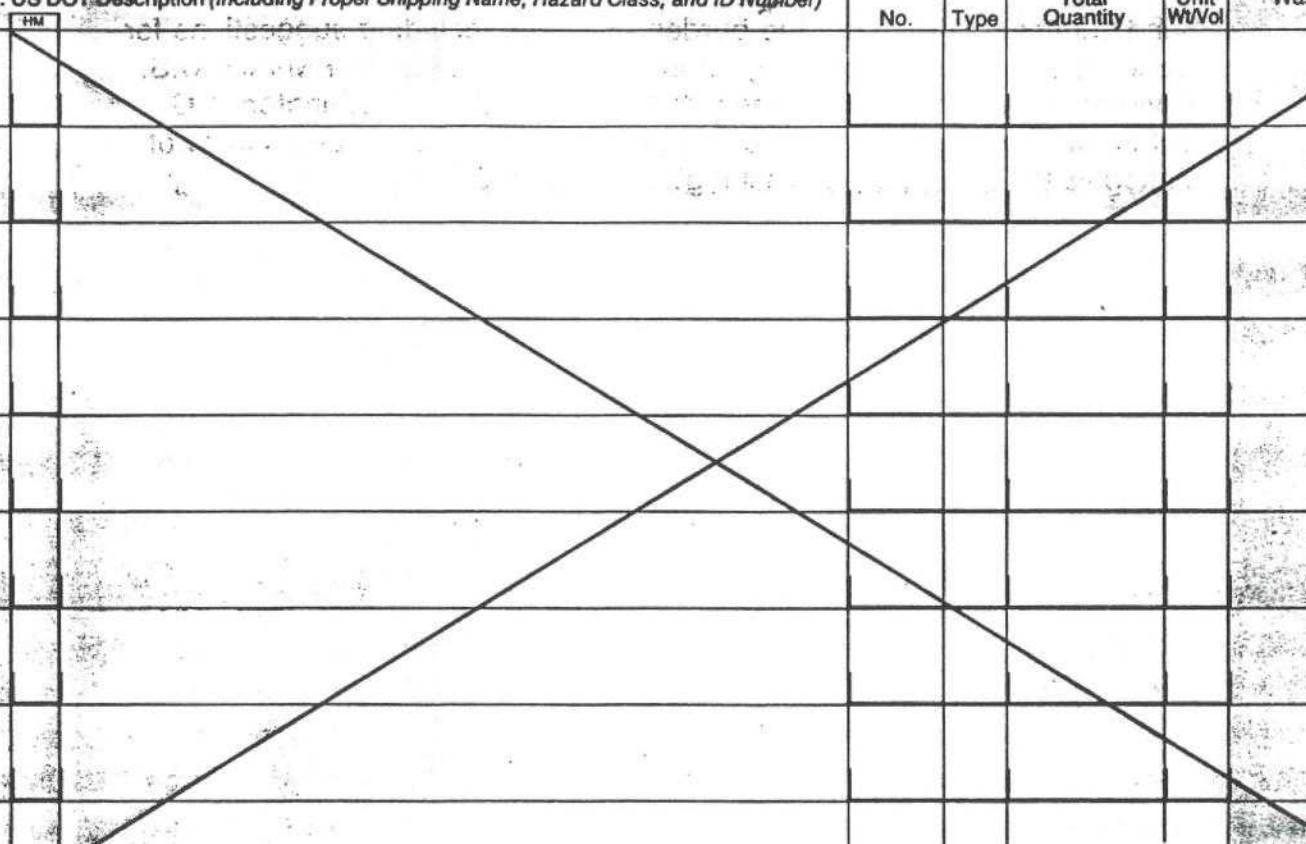


Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No	2. Page 1 of 3	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address		AKD000850701 AKD000850701		A. State Manifest Document Number		
Hapco, Alaska Petroleum, Inc.				B. State Generator's ID		
1100 H & H Lane, North Pole, Alaska 99805				C. State Transporter's ID		
4. Generator's Phone (907) 488-2741				D. Transporter's Phone (907) 212-3907		
5. Transporter 1 Company Name		6. US EPA ID Number		E. State Transporter's ID		
Northwest EnviroService, Inc.		AKD983068602		F. Transporter's Phone (907) 275-4900		
7. Transporter 2 Company Name		8. US EPA ID Number		G. State Facility's ID		
Lynden Transport, Inc.		WAD002799260		H. Facility's Phone (206) 622-1090		
9. Designated Facility Name and Site Address		10. US EPA ID Number				
Northwest EnviroService, Inc.						
1500 Airport Way South						
Seattle, Washington 98134		WAD058367152				
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)		12. Containers		13. Total Quantity		14. Unit
		No. Type				Wt/Vol
a. <input checked="" type="checkbox"/> RO Waste combustible liquid, n.o.s. (mineral spirits, chromium) Combustible liquid, NA1993 (D001)		1		DM		20
						G
b. <input checked="" type="checkbox"/> RO Waste flammable liquid, n.o.s. (Petroleum distillates) Flammable liquid, UN1993 (D001)		1		DM		55
						G
c. <input checked="" type="checkbox"/> XX Waste Combustible Liquid n.o.s. (Petroleum Distillates, Chromium) Combustible Liquid NA1993		1		DM		5
						G
d.						
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above				
a) WPD 001009 (waste paint with chromium) F Ser. (aystech)		a) S01C, S02T, T50T				
b) WPD 001008 (sludge) API (N)		b) S01C, T21T				
c) WPD 001006 (heat exchange sludge) K050		c) S01C, T38C				
15. Special Handling Instructions and Additional Information						
a) Drum # MA-0953 (35 gal)						
b) Drum # MA-0949 (55 gal)						
c) Drum # MA-0955 (5 gal)						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway, rail, and water according to applicable international and national government regulations.						
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name		Signature		Month		Day Year
Kathleen McCullom		Kathleen McCullom		12		105/91
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature		Month		Day Year
Printed/Typed Name		Signature		Month		Day Year
LARRY REITER		Larry Reiter For NWES		12		105/91
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Month		Day Year
Printed/Typed Name		Signature		Month		Day Year
Richard Jobe		Richard Jobe		12		108/91
19. Discrepancy Indication Space						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name		Signature		Month		Day Year
STEVE DRUMHELLER		Steve Drumheller		12		22/91

LTIA 3129

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator's US EPA ID No. AKD00850701	Manifest Document No. NTR08 NPRO8	22. Page 2 of 3	Information in the shaded areas is not required by Federal law.		
23. Generator's Name Apco, Alaska Petroleum, Inc. 1100 H.T. H. Lane North Pole, Alaska 99705				L. State Manifest Document Number			
24. Transporter Company Name Toten Ocean Trailer Express				M. State Generator's ID			
25. US EPA ID Number WAD078397955				N. State Transporter's ID			
26. Transporter Company Name Lynden Transport, Inc.				O. Transporter's Phone (907) 276-5868			
27. US EPA ID Number WAD002799260				P. State Transporter's ID			
28. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				29. Containers No.	30. Total Quantity	31. Unit W/Vol	R. Waste No.
a. 							
b.							
c.							
d.							
e.							
f.							
g.							
h.							
i.							
S. Additional Descriptions for Materials Listed Above				T. Handling Codes for Wastes Listed Above			
32. Special Handling Instructions and Additional Information							
TRANSPORTER	33. Transporter 3 Acknowledgement of Receipt of Materials				Date		
	Printed/Typed Name TED De Boer		Signature 		Month Day Year 2 16 91		
	34. Transporter 4 Acknowledgement of Receipt of Materials		Signature 		Date		
FACILITY	Printed/Typed Name RONALD F. Calkins		Signature		Month Day Year 2 20 91		
	35. Discrepancy Indication Space						

H

**UNIFORM HAZARDOUS
WASTE MANIFEST
(Continuation Sheet)**

21. Generator's US EPA ID No.

~~AKD00050701~~
AKD000850701

Manifest Document No.

~~HTR00~~
NPROB

22. Page 3
of 3

Information in the shaded
areas is not required by Federal
law.

23. Generator's Name

Apco, Alaska Petroleum, Inc.

1100 H & H Lane

North Pole, Alaska 99805

L. State Manifest Document Number

M. State Generator's ID

Unit 16 1000000

24. Transporter Company Name

Northwest EnviroService, Inc.

25. US EPA ID Number

WAD058367152

N. State Transporter's ID

O. Transporter's Phone (206) 622-1090

26. Transporter Company Name

27. US EPA ID Number

P. State Transporter's ID

Q. Transporter's Phone

28. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

29. Containers

No. Type

30. Total
Quantity

31. Unit
Wt/Vol

32. Waste No.

a.					
b.					
c.					
d.					
e.					
f.					
g.					
h.					
i.					

S. Additional Descriptions for Materials Listed Above

T. Handling Codes for Wastes Listed Above

32. Special Handling Instructions and Additional Information

33. Transporter Acknowledgement of Receipt of Materials

Printed/Typed Name

Daniel J Barkis

Signature

Daniel J Barkis

Date

Month Day Year
02 22 91

34. Transporter Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Date

Month Day Year

35. Discrepancy Indication Space

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. AKD000850701		Manifest Document No NPR07		2. Page 1 of 2		Information in the shaded areas not required by Federal law.									
3. Generator's Name and Mailing Address MAPCO Alaska Petroleum, Inc. 1100 H & H Lane, North Pole, AK 99705						A. State Manifest Document Number											
4. Generator's Phone (907) 488-2741						B. State Generator's ID											
5. Transporter 1 Company Name Northwest EnviroService, Inc.						C. State Transporter's ID											
6. US EPA ID Number AKD983068602						D. Transporter's Phone (907) 272-9007											
7. Transporter 2 Company Name Lynden Transport, Inc.						E. State Transporter's ID											
8. US EPA ID Number WAD002799260						F. Transporter's Phone (907) 276-4800											
9. Designated Facility Name and Site Address Northwest EnviroService, Inc. 1500 Airport Way S. Seattle, WA 98134						G. State Facility's ID											
10. US EPA ID Number WAD058367152						H. Facility's Phone (206) 622-1090											
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.					
a. X Waste chromic acid solution Corrosive material, UN1755						1. DR		4		G		D002, D007 HT02					
b.																	
c.																	
d.																	
16. Additional Descriptions for Materials Listed Above a. WPQH AK 1016 - Chromic acid - MA 0947						K. Handling Codes for Wastes Listed Above a) S01C, T311, T237											
15. Special Handling Instructions and Additional Information																	
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.																	
Printed/Typed Name Kathleen McCullom						Signature Kathleen McCullom				Month Day Year 8 29 90							
17. Transporter 1 Acknowledgement of Receipt of Materials						Printed/Typed Name LARRY REITER				Signature Larry Reiter				Month Day Year 8 29 90			
18. Transporter 2 Acknowledgement of Receipt of Materials						Printed/Typed Name Randy Larson LTI				Signature Randy Larson				Month Day Year 8 29 90			
19. Discrepancy Indication Space																	
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.																	
Printed/Typed Name William K DENIKE						Signature William K Denike				Month Day Year 10 9 90							

T/L 3701

H-560

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Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator's US EPA ID No. AKD000850701	Manifest Document No. NPR07	22. Page 2 of 2	Information in the shaded areas is not required by Federal	
23. Generator's Name NAPOO Alaska Petroleum, Inc. 1100 H & H Lane North Pole, AK 99705 (907) 488-2741			L. State Manifest Document Number		M. State Generator's ID	
24. Transporter Company Name Northwest Environmental, Inc.			25. US EPA ID Number AK0983008002		N. State Transporter's ID	
26. Transporter Company Name Lynden Transport, Inc.			27. US EPA ID Number WAD002799260		P. State Transporter's ID	
28. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)			29. Containers		30. Total Quantity	31. Unit Wt/Vol
			No.	Type		
a.						
b.						
c.						
d.						
e.						
f.						
g.						
h.						
i.						
32. Special Handling Instructions and Additional Information			T. Handling Codes for Wastes Listed Above			
33. Transporter 3 Acknowledgement of Receipt of Materials			Signature <i>Larry Reiter</i>		Date Month Day Year 9 16 90	
34. Transporter 7 Acknowledgement of Receipt of Materials			Signature <i>Richard Jobe</i>		Date Month Day Year 9 13 90	
35. Discrepancy Indication Space						

7/L 3701

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Form Approved, OMB No. 2050-0039, Expires 9-30-91

4	UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator's US EPA ID No. AKD000850701	Manifest Document No. NPR07	22. Page 3 of 3	Information in the shaded areas is not required by Federal law.			
	23. Generator's Name MAPOO Alaska Petroleum, Inc. 1100 H & H Lane, North Pole, AK 99705 (907) 488-5711				L. State Manifest Document Number		M. State Generator's ID		
	24. Transporter's Company Name Totem Ocean Trailer Express				25. US EPA ID Number WAD0703979552		N. State Transporter's ID		
	26. Transporter's Company Name Lynden Transport, Inc.				27. US EPA ID Number WAD002799260		O. Transporter's Phone (907) 276-5868		
							P. State Transporter's ID		
GENERATOR	28. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				29. Containers	30. Total	31. Unit	32. Waste No.	
					No.	Type	Quantity	W/Vol	
	a.								
	b.								
	c.								
	d.								
	e.								
	f.								
	g.								
	h.								
i.									
S. Additional Descriptions for Materials Listed Above				T. Handling Codes for Wastes Listed Above					
32. Special Handling Instructions and Additional Information									
TRANSPORTER	33. Transporter's Acknowledgement of Receipt of Materials				Date				
	Printed/Typed Name ROBERT MALY		Signature Robert Maly		Month Day Year 9/16/90				
	34. Transporter's Acknowledgement of Receipt of Materials		Signature Dominic F. Weber		Date 9/20/90				
FACILITY	35. Discrepancy Indication Space								

Form Approved OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. AKD0000850701		2. Page 1 of 2		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address Mapco Alaska Petroleum Inc. 1106 H 9 H Lane North Pole AK 99705		4. Generator's Phone 907-488-2741		5. Transporter 1 Company Name Lynden Transport		US EPA ID Number WAD00279260	
6. Designated Facility Name and Site Address <input checked="" type="checkbox"/> Chempro 234 So. Lucile St. Seattle, WA (206) 762-3362 <input type="checkbox"/> Chempro 1701 Alexander Tacoma, WA (206) 838-4774 <input type="checkbox"/> Chempro 20245 76th Ave. South Kent, WA (206) 872-8030 <input type="checkbox"/> Other:		7. Transporter 2 Company Name Totem Ocean Trailer Express		US EPA ID Number WAD070397955		US EPA ID Number WAD 000812909 WAD 020257945 WAD 991281767	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) a. X RC Waste Poison B, Liquid N.D.S. (Tetraethyl-lead, Tetramethyl lead) Poison B UN2810 (0008, 0001)		12. Containers No. Type 1 PM		13. Total Quantity 55		14. Unit Wt/Vol G	
b. RC Waste Poison B, Liquid N.D.S. (Tetraethyl-lead, Tetramethyl lead) Poison B UN2810 (0008, 0001)							
c. RC Waste Poison B, Liquid N.D.S. (Tetraethyl-lead, Tetramethyl lead) Poison B UN2810 (0008, 0001)							
d. RC Waste Poison B, Liquid N.D.S. (Tetraethyl-lead, Tetramethyl lead) Poison B UN2810 (0008, 0001)							
15. Special Handling Instructions and Additional Information Emergency Response Guide No. 1A-55 GENERATOR EMERGENCY TELEPHONE 907-528-1961 or 488-2741 <input type="checkbox"/> CERTIFICATE OF DESTRUCTION/DISPOSAL REQUIRED		16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.		17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name JAMES A YOUNG Signature James A Young Month Day Year 7 15 91		18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name ROBERT MALY Signature Robert Maly Month Day Year 4 19 91	
19. Discrepancy Indication Space		20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name ON BEHALF OF CHEMPRO KATHLEEN A. BETTERMAN Signature Kathleen A. Betterman Month Day Year 04 26 91		RECEIVED MAY 10 1991			

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-91

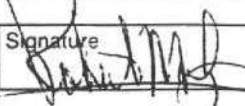
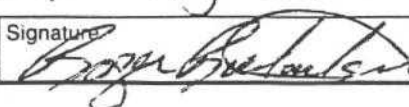
UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. AKD000850701	Manifest Document No. NPR06		2. Page 1 of 2 Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address MAPCO Alaska Petroleum, Inc. 1100 H & H Lane, North Pole, AK 99705					A. State Manifest Document Number	
4. Generator's Phone (907) 488-2741					B. State Generator's ID	
5. Transporter 1 Company Name Northwest EnviroService, Inc.			6. US EPA ID Number AKD983068602		C. State Transporter's ID	
7. Transporter 2 Company Name Lynden Transport, Inc.			8. US EPA ID Number WAD002799260		D. Transporter's Phone (907) 272-9007	
9. Designated Facility Name and Site Address Northwest EnviroService, Inc. 1500 Airport Way S. Seattle, WA 98134			10. US EPA ID Number WAD058367152		E. State Transporter's ID	
					F. Transporter's Phone (907) 276-4800	
					G. State Facility's ID	
					H. Facility's Phone (206) 622-1090	
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)					12. Containers	13. Total Quantity
					No.	Type
a. <input checked="" type="checkbox"/> Waste flammable liquid, n.o.s. Flammable liquid, UN1993					13	DM
b. Non-RCRA waste liquid					1	DM
c. <input checked="" type="checkbox"/> Waste flammable liquid, n.o.s. (naphthenes) Flammable liquid, UN1993.					1	DM
d.						
J. Additional Descriptions for Materials Listed Above					K. Handling Codes for Wastes Listed Above	
a. WPQ# AK 1008 - Sump sludge - MA 0898-905, 942-946, 948					a,b) SOL, T21T	
b. WPQ# AK 1010 - Desalter sludge - MA 0910					c) SOL, SOLT, T50T	
c. WPQ# AK 0781 - Paint thinner - MA 0888						
15. Special Handling Instructions and Additional Information						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.						
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name Kathleen McCullom					Signature K. McCullom	
					Month Day Year 8 29 90	
17. Transporter 1 Acknowledgement of Receipt of Materials						
Printed/Typed Name LARRY REITER					Signature Larry Reiter	
					Month Day Year 8 29 90	
18. Transporter 2 Acknowledgement of Receipt of Materials						
Printed/Typed Name Randy Larson L.T.F.					Signature Randy Larson	
					Month Day Year 8 29 90	
19. Discrepancy Indication Space Line #18. Transporter 2 Did not Del Manifest.						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19						
Printed/Typed Name Patrick Weaver					Signature Patrick Weaver	
					Month Day Year 10 08 90	

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

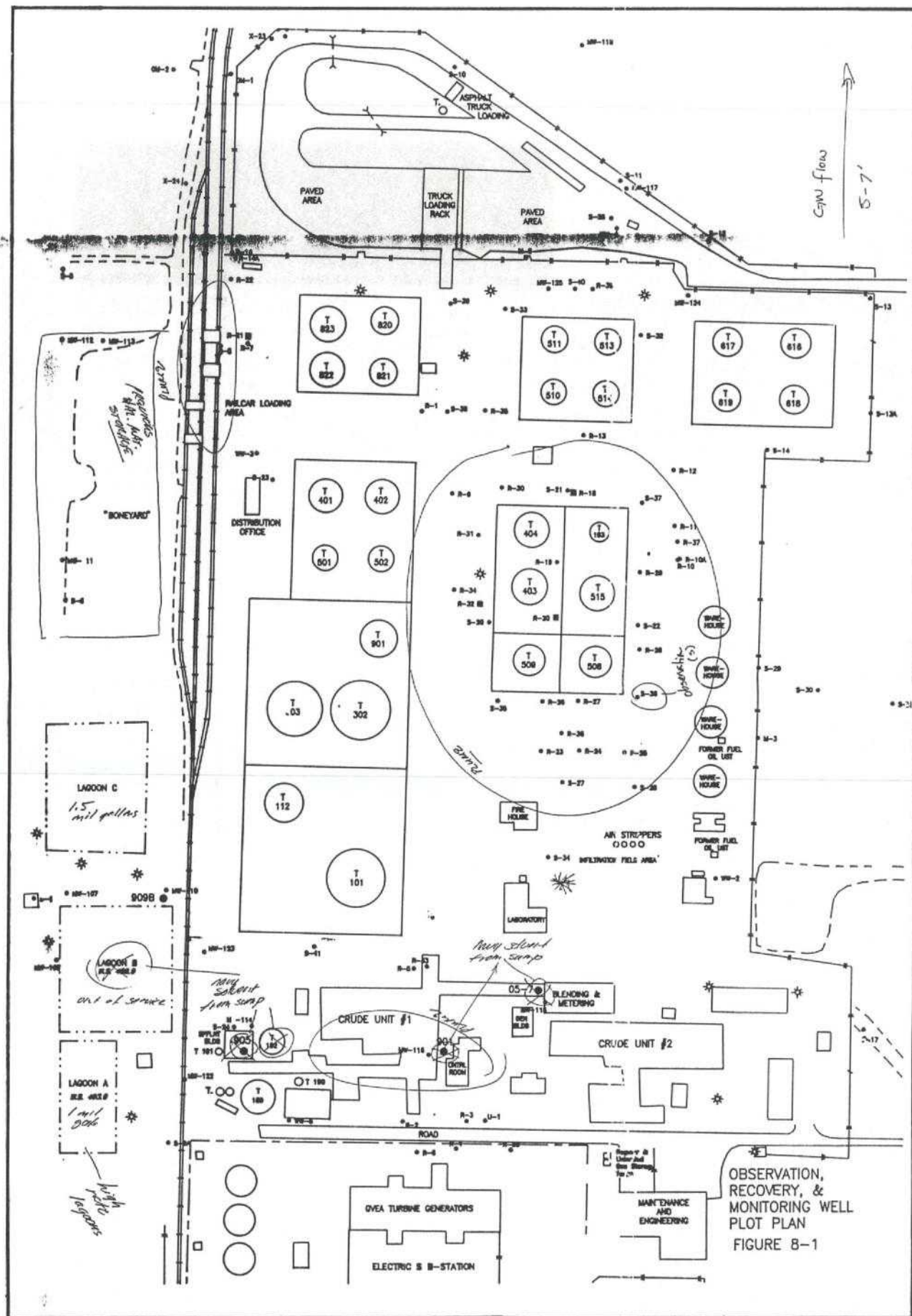
Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator's US EPA ID No. AKD000850701	Manifest Document No. NPR06		22. Page 2 of 2 Information in the shaded areas is not required by Federal law
23. Generator's Name MAPCO Alaska Petroleum, Inc. 1100 H & H Lane North Pole, AK 99705 (907) 488-2741				L. State Manifest Document Number	
24. Transporter Company Name Toten Ocean Trailer Express ENVISERV, INC. AKD070897955 AKD983068602				M. State Generator's ID	
25. US EPA ID Number				N. State Transporter's ID	
26. Transporter Company Name Lynden Transport, Inc.				O. Transporter's Phone (907) 276-5868	
27. US EPA ID Number WAD002799260				P. State Transporter's ID	
28. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				Q. Transporter's Phone (907) 276-4800	
29. Containers		30. Total Quantity	31. Unit Wt/Vol	R. Waste No.	
No.	Type				
a. X	Hazardous waste solid, n.o.s. (chromium, lead) ORM-E, NA 9189	1	DM	20	P K050 D001, D006 WT02
b. X	Hazardous waste liquid, n.o.s. ORM-E, NA 9189	2	DM	85	G D007 D008 WT02
c.					
d.					
e.					
f.					
g.					
h.					
i.					
S. Additional Descriptions for Materials Listed Above				T. Handling Codes for Wastes Listed Above	
1a. WPQ# AK 1006 - heat exchange sludge - #MA-0906				a) SOLID, T21T	
1b. WPQ# AK 1005 - sulfolane - #MA-0907, 0908				b) SOLID, S02T, T50T	
32. Special Handling Instructions and Additional Information					
33. Transporter 3 Acknowledgement of Receipt of Materials					
Printed/Typed Name LARRY REITER				Signature Larry Reiter	
34. Transporter 4 Acknowledgement of Receipt of Materials				Date Month Day Year 9 6 90	
Printed/Typed Name Richard F Jobe				Signature Richard F Jobe	
35. Discrepancy Indication Space				Date Month Day Year 9 11 90	

T/L 3704

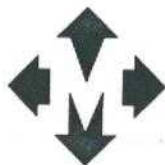
GENERATOR	UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator's US EPA ID No. AKD000850701	Manifest Document No. NPR06	22. Page 3 of 3	Information in the shaded areas is not required by Federal law.			
	23. Generator's Name MAPCO Alaska Petroleum, Inc. 1100 H & H Lane, North Pole, AK 99705 (907) 488-2741				L. State Manifest Document Number				
					M. State Generator's ID				
	24. Transporter <u>5</u> Company Name Totem Ocean Trailer Express		25. US EPA ID Number WAD070397955		N. State Transporter's ID				
					O. Transporter's Phone 907) 276-5868				
	26. Transporter <u>6</u> Company Name Lynden Transport, Inc.		27. US EPA ID Number WAD002799260		P. State Transporter's ID				
					Q. Transporter's Phone 907) 276-4800				
	28. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)			29. Containers	30. Total Quantity	31. Unit Wt/Vol	R. Waste No.		
				No.	Type				
	a.								
b.									
c.									
d.									
e.									
f.									
g.									
h.									
i.									
S. Additional Descriptions for Materials Listed Above					T. Handling Codes for Wastes Listed Above				
32. Special Handling Instructions and Additional Information									
TRANSPORTER	33. Transporter <u>5</u> Acknowledgement of Receipt of Materials				Date				
	Printed/Typed Name ROBERT MALY				Month Day Year 9/13/90				
	Signature 								
FACILITY	34. Transporter <u>6</u> Acknowledgement of Receipt of Materials				Date				
	Printed/Typed Name ROGER RICHARDSON				Month Day Year 09/19/90				
	Signature 								
35. Discrepancy Indication Space									

ATTACHMENT #2



260 acres
40 acres pop.
27 mi.
old mang
valley
7 mi. from
St
500-1000 ft
work
product
mining

ATTACHMENT #3



CO-041
MAPCO ALASKA PETROLEUM INC.

1100 H&H LANE
NORTH POLE, ALASKA 99705
(907) 488-2741

July 31, 1991

Kurt Eilo
Hazardous Waste Coordinator
U.S. Environmental Protection Agency
222 West 7th Ave., Box 19
Anchorage, AK 99513-7588

Re: Satellite Areas

Dear Mr. Eilo,

As a result of the RCRA Compliance Investigation of MAPCO ALASKA PETROLEUM Inc.'s (MAPI) North Pole Refinery on July 29, you commented on the location of the laboratory's hazardous waste satellite area. A 35 gallon barrel is located directly outside the laboratory door and used for the storage of broken thermometers and hydrometers. No accumulation date was labeled on this barrel.

40 CFR §262.34(c)1 provides that "A generator may accumulate as much as 55 gallons of hazardous waste ... in containers at or near any point of generation where wastes initially accumulate ...". We understand that EPA as interpreted "near" to mean that you cannot pass through a doorway to access the container.

We at MAPI believe not only that we complied with both the letter and the spirit of the regulations, but also that the storage of this material within the laboratory would create an unnecessary health hazard; therefore, MAPI will continue to store this material in the same location and in the same manner with the exception that the accumulation date will be posted and tracked so that this material will be disposed of within the 270 days that is allowed for a small quantity generator located more than 200 miles from a disposal facility.

If you have any questions or comments concerning this issue, or any other issue that came to mind after the inspection, please call me at 488-0033.

Sincerely,

Kathleen McCullom
Environmental Coordinator
MAPCO ALASKA PETROLEUM Inc.

cc: G. Fritz
D. Rowse
J. Niedermeyer

RECEIVED

JUL 31 1991

ANCHORAGE-A00/A